

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TIM ANDERSON, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	23-cv-02245
v.)	
)	Honorable Jorge L. Alonso
DAVID BROWN, <i>et al.</i> ,)	
)	Magistrate Jeffrey T. Gilbert
Defendants.)	

**JOINT STATUS REPORT REGARDING SETTLEMENT IN PRINCIPLE
AND MOTION TO STAY CASE MANAGEMENT DEADLINES**

The Plaintiffs, Defendant City of Chicago, and Defendant former Superintendent David Brown, by and through their undersigned counsel, (collectively “the Parties”) jointly file this status report to advise the Court they have reached a settlement in principle, which if approved by the Chicago City Council, would resolve this case in its entirety. In light of this development, the Parties respectfully request that this Court stay case management deadlines in this matter and order the Parties to file a status report updating the Court on the City Council approval process on or before January 15, 2026. In further support of this Motion the Parties state as follows:

1. The Parties’ settlement in principle requires the City of Chicago to pay the Plaintiffs an agreed upon amount, inclusive of attorneys’ fees and costs. The agreed upon amount will require City Council approval.
2. The Parties anticipate that their final written settlement agreement will include the following language, which describes the standard City Council approval process for settlements over \$100,000:

The City’s obligations pursuant to this Release and Settlement Agreement are conditioned upon approval of the settlement agreement by the Chicago City Council. The City will not be obligated to perform its obligations pursuant to this Release and Settlement Agreement until the following events occur: (1) the City

receives a copy of this Release and Settlement Agreement executed by plaintiffs and their attorneys; (2) the Chicago City Council enacts an ordinance authorizing settlement and payment of the funds agreed upon in this Release and Settlement Agreement; and (3) the court enters an order dismissing this case without prejudice which automatically converts to a dismissal with prejudice 75 days from the entry of the order, with each party bearing its own costs and attorneys' fees.

3. The Parties do not yet know when the City Council would consider this matter but anticipate that the formal approval process will take at least two months.

4. The Parties' settlement number anticipates neither party will expend further litigation resources on this matter and was calculated in anticipation of the City Council approval process. In short, absent unforeseen circumstances, the Parties believe that this matter will be fully resolved by early next year.

5. For these reasons, the Parties' respectfully request that the Court enter a stay of case management deadlines and order the Parties to file a joint status report on or before January 15, 2026.

Date: October 15, 2025

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